Richard I. Hutson, Esq. (VSB No. 71097) FULLERTON & KNOWLES, P.C. 12642 Chapel Rd. Clifton, CA 20124 (703) 818-2602

Wanda Borges, Esq. (NY Reg. No. 1604404) BORGES & ASSOCIATES, LLC 575 Underhill Blvd., Ste. 118 Syosset, NY 11791 (516) 677-8200 Counsel to Sharp Electronics Corporation

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

	$\cdot X$
In re:	: Chapter 11
CIRCUIT CITY STORES, INC., et al.,	: : Case No. 08-35653 (KPH)
Debtors.	: : : Jointly Administered
	. X

# MOTION TO APPEAR PRO HAC VICE PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(E)(2)

COMES NOW THE MOVANT, Richard Hutson (the "Movant"), a member in good standing of the bar of the Supreme Court of Virginia, and admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia (the "Court"), and an associate of Fullerton & Knowles, PC, and hereby moves (the "Motion") this Court to enter an order authorizing Wanda Borges of Borges & Associates, LLC, to appear *pro hac vice* before this Court to represent Sharp Electronics Corporation in the above-captioned chapter 11 bankruptcy cases pursuant to Rule 2090-1(E)(2) of the Local Bankruptcy Rules of the Untied States Bankruptcy Court for the Eastern District of Virginia (the "Local Bankruptcy Rules"). In support of the Motion, the Movant states as follows:

- 1. Wanda Borges is the principal member of Borges & Associates, LLC and has appeared regularly before numerous bankruptcy courts throughout the United States in Chapter 11 cases.
- 2. Ms. Borges is admitted to practice and in good standing as a member of the bar of the State of New York. Among other courts, she is admitted to practice in the United States District Court for the Southern, Eastern, Northern, and Western Districts of New York; the United States District Court for the District of Connecticut; the Second Circuit Court of Appeals; and the Supreme Court of the United States.
- 3. Ms. Borges has been practicing law since 1979 and has not been reprimanded in any court nor has there been any action in any court pertaining to Ms. Borges' conduct or fitness as a member of any bar.
- 4. Ms. Borges hereby certifies that, within 90 days before the submission of this application, she has read the Local Rules of this Court and that her knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.
- 5. The Movant hereby requests that this Court grant this Motion be granted and Ms. Borges be admitted to appear before this Court *pro hac vice*.
- 6. It is understood that admission *pro hac vice* does not constitute formal admission to the bar of the United States District Court for the Eastern District of Virginia.

#### WAIVER OF MEMORANDUM OF LAW

7. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, the Movant request that this Court waive the requirement that all motions be accompanied by a written memorandum of law.

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WHEREFORE, the Movant respectfully requests that this Court enter an order, substantially in the form attached hereto as Exhibit "A," (i) authorizing Wanda Borges to appear pro hac vice in association with the Movant as attorneys for Sharp Electronics Corporation and (ii) granting such other and further relief as is just and proper.

Dated: December 18, 2009

Respectfully submitted,

/s/ Richard Hutson\_

Richard I. Hutson, Esq. (VSB No. 71097) FULLERTON & KNOWLES, P.C. 12642 Chapel Rd. Clifton, CA 20124 (703)818-2600 Fax (703) 818-2602 rhutson@fullertonlaw.com

Richard I. Hutson, Esq. (VSB No. 71097) FULLERTON & KNOWLES, P.C. 12642 Chapel Rd. Clifton, CA 20124 (703) 818-2602 Counsel to Sharp Electronics Corporation

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### IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

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In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., et	al., :	Case No. 08-35653
	:	
Debtors.	:	
	:	Jointly Administered
	X	•

## ORDER GRANTING MOTION TO APPEAR PRO HAC VICE PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(E)(2)

THIS MATTER having come before the Court upon the Motion to Appear Pro Hac Vice Pursuant to Local Bankruptcy Rule 2090-1(E)(2) (the "Motion") of Richard Hutson, associate with the law firm of Fullerton & Knowles, P.C., for the admission *pro hac vice* of Wanda Borges, the Court finds that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), (iii) the relief requested in the Motion is in the best interest of the Debtors, their estates, and their creditors, (iv) proper and adequate notice of the Motion and the hearing thereon has been given and that no other or further notice is necessary, and (v) good and sufficient cause exists for the

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granting of the relief requested in the Motion after having given due deliberation upon the

Motion and all of the proceedings had before the Court in connection with the Motion,

Therefore,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED.

2. Wanda Borges is permitted to appear pro hac vice as counsel to Sharp Electronics

Corporation in the above-captioned chapter 11 cases in accordance with Local Bankruptcy Rule

2090-1(E)(2).

Dated: December\_\_\_\_, 2009

UNITED STATES BANKRUPTCY JUDGE

I ASK FOR THIS:

/s/ Richard I. Hutson
Richard I. Hutson, Esq.
VSB# 71097
Fullerton & Knowles, P.C.
12642 Chapel Road
Clifton, VA 20124
(703) 818-2600
FAX: (703) 818-2602
rhutson@fullertonlaw.com

Counsel to Sharp Electronics Corporation

#### **CERTIFICATION OF ENDORSEMENT UNDER LOCAL RULE 9022-1(C)**

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing Motion and proposed order have been endorsed by all necessary parties, filed on December 18, 2009 using the Court's CM/ECF system and thereby served electronically upon all registered users of the ECF system that have filed a 2002 notice of appearance in this matter, and served upon the Core Group, which includes the Debtors, co-counsel to the Debtors, the Office of the United States Trustee, co-counsel for any committee, counsel to the agents for the Debtors' pre-petition lenders, and counsel to the agents for the Debtors' post-petition lenders, via regular US mail, first class, postage prepaid, as required by the Case Management Order.

/s/ Richard I. Hutson	
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